

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

IN RE:

TERESA M. LITZINGER

Debtor

Case No. 13-12535-BFK
Chapter 7

**TRUSTEE'S MOTION TO COMPEL DEBTOR
TO TURN OVER PROPERTY OF THE ESTATE**

Janet M. Meiburger, Esq., the Chapter 7 trustee for the estate of the debtor in the above-named case (the "Trustee"), by proposed counsel, hereby moves, pursuant to 11 U.S.C. §542(a) and Federal Rule of Bankruptcy Procedure 9013, for entry of an order compelling Teresa M. Litzinger, the Debtor herein, to turn over property of the bankruptcy estate, and in support of this Motion states as follows:

1. On May 31, 2013 (the "Petition Date"), the Debtor filed her voluntary petition for relief under Chapter 7 of the Bankruptcy Code. The Trustee was appointed on June 1, 2013 (Docket No. 4).

2. The Debtor's Schedule B shows a life insurance policy with Lafayette Life Insurance Company. As of June 13, 2013, the life insurance policy had a cash surrender value of \$5,786.20.

3. The Debtor has availablilty on her Homestead Deed to claim \$2,900.00 of the life insurance cash surrender value as exempt.

Janet M. Meiburger, VA Bar No. 31842
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McLean, VA 22101
(703) 556-7871
Proposed Counsel to Chapter 7 Trustee

3. The Trustee has requested that the Debtor turn over the non-exempt cash surrender value of \$2,886.20. However, the Debtor has not responded to the Trustee's request.

WHEREFORE, Janet M. Meiburger, Esq., the Trustee for the estate of the Debtor in the above-named case, by proposed counsel, respectfully requests that the Court enter an order compelling Teresa M. Litzinger to turn over property of the bankruptcy estate as described herein.

Respectfully submitted,

THE MEIBURGER LAW FIRM, P.C.

Dated: January 31, 2014

By: /s/ Janet M. Meiburger
Janet M. Meiburger, Esq., VSB No. 31842
The Meiburger Law Firm, P.C.
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(703) 556-7871

Proposed Counsel to Chapter 7 Trustee

CERTIFICATE OF SERVICE

I HEREBY certify that on this 31st day of January, 2014, a true and correct copy of the foregoing Trustee's Motion to Compel Debtor to Turn Over Property of the Estate will be served by ECF e-mail pursuant to the applicable Standing Order of the Court, and by first class mail, postage prepaid on the following:

Ronald J. Aiani
86 East Lee St.
Warrenton, VA 20186-3328
Counsel for the Debtor

Teresa M. Litzinger
9356 Harts Mill Road
Warrenton, VA 20186

/s/ Janet M. Meiburger
Janet M. Meiburger